

# **Exhibit 1**

\* 5 0 0 6 8 2 2 3 \*

FILED

3/29/2021 11:23 AM

IRIS Y. MARTINEZ

CIRCUIT CLERK

COOK COUNTY, IL

2021CH01474

12746080

2120 - Served

2121 - Served

2620 - Sec. of State

2220 - Not Served

2221 - Not Served

2621 - Alias Sec of State

2320 - Served By Mail

2321 - Served By Mail

2420 - Served By Publication

2421 - Served By Publication

Summons - Alias Summons

(12/01/20) CCG 0001 A

## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Name all Parties

Angela Jordan

Plaintiff(s)

v.

Cavalry SPV I, LLC, and Cavalry Portfolio  
Services, LLC

Defendant(s)

Cavalry Portfolio Services, LLC  
208 S. LaSalle St., Suite 814, Chicago, IL 60603

Address of Defendant(s)

2021CH01474

Case No.

Please serve as follows (check one): ☐ Certified Mail ☒ Sheriff Service ☐ Alias

## SUMMONS

To each Defendant:

You have been named a defendant in the complaint in this case, a copy of which is hereto attached. You are summoned and required to file your appearance, in the office of the clerk of this court, within 30 days after service of this summons, not counting the day of service. If you fail to do so, a judgment by default may be entered against you for the relief asked in the complaint.

**THERE WILL BE A FEE TO FILE YOUR APPEARANCE.**

To file your written appearance/answer **YOU DO NOT NEED TO COME TO THE COURTHOUSE.** You will need: a computer with internet access; an email address; a completed Appearance form that can be found at <http://www.illinoiscourts.gov/Forms/approved/procedures/appearance.asp>; and a credit card to pay any required fees.

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois  
[cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org)

**Summons - Alias Summons**

E-filing is now mandatory with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider.

If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/faq/gethelp.asp> or talk with your local circuit clerk's office. If you cannot e-file, you may be able to get an exemption that allows you to file in-person or by mail. Ask your circuit clerk for more information or visit [www.illinoislegalaid.org](http://www.illinoislegalaid.org).

If you are unable to pay your court fees, you can apply for a fee waiver. For information about defending yourself in a court case (including filing an appearance or fee waiver), or to apply for free legal help, go to [www.illinoislegalaid.org](http://www.illinoislegalaid.org). You can also ask your local circuit clerk's office for a fee waiver application.

Please call or email the appropriate clerk's office location (on Page 3 of this summons) to get your court hearing date AND for information whether your hearing will be held by video conference or by telephone. The Clerk's office is open Mon - Fri, 8:30 am - 4:30 pm, except for court holidays.

**NOTE: Your appearance date is NOT a court date. It is the date that you have to file your completed appearance by. You may file your appearance form by e-filing unless you are exempted.**

A court date will be set in the future and you will be notified by email (either to the email address that you used to register for e-filing, or that you provided to the clerk's office).

**CONTACT THE CLERK'S OFFICE for information regarding COURT DATES by visiting our website: [cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org); download our mobile app from the AppStore or Google play, or contact the appropriate clerk's office location listed on Page 3.**

To the officer: (Sheriff Service)

This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so endorsed. This summons may not be served later than thirty (30) days after its date.

3/29/2021 11:23 AM IRIS Y. MARTINEZ

☒ Atty. No.: 41106

☐ Pro Se 99500

Name: Daniel A. Edelman

Atty. for (if applicable):

Plaintiff

Address: 20 S Clark St, Suite 1500

City: Chicago

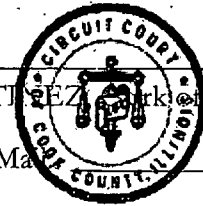
State: IL Zip: 60603

Telephone: 312 739 4200

Primary Email: [courtecl@edcombs.com](mailto:courtecl@edcombs.com)

Witness date \_\_\_\_\_

IRIS Y. MARTINEZ, Clerk of Court



☐ Service by Certified Mail \_\_\_\_\_

☐ Date of Service: \_\_\_\_\_  
(To be inserted by officer on copy left with employer or other person)

**Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois**  
**[cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org)**



**GET YOUR COURT DATE BY CALLING IN OR BY EMAIL**

**CALL OR SEND AN EMAIL MESSAGE** to the telephone number or court date email address below for the appropriate division, district or department to request your next court date. Email your case number, or, if you do not have your case number, email the Plaintiff or Defendant's name for civil case types, or the Defendant's name and birthdate for a criminal case.

**CHANCERY DIVISION**

**Court date EMAIL:** ChanCourtDate@cookcountycourt.com

Gen. Info: (312) 603-5133

**CIVIL DIVISION**

**Court date EMAIL:** CivCourtDate@cookcountycourt.com

Gen. Info: (312) 603-5116

**COUNTY DIVISION**

**Court date EMAIL:** CntyCourtDate@cookcountycourt.com

Gen. Info: (312) 603-5710

**DOMESTIC RELATIONS/CHILD SUPPORT  
DIVISION**

**Court date EMAIL:** DRCourtDate@cookcountycourt.com

OR

ChildSupCourtDate@cookcountycourt.com

Gen. Info: (312) 603-6300

**DOMESTIC VIOLENCE**

**Court date EMAIL:** DVCourtDate@cookcountycourt.com

Gen. Info: (312) 325-9500

**LAW DIVISION**

**Court date EMAIL:** LawCourtDate@cookcountycourt.com

Gen. Info: (312) 603-5426

**PROBATE DIVISION**

**Court date EMAIL:** ProbCourtDate@cookcountycourt.com

Gen. Info: (312) 603-6441

**ALL SUBURBAN CASE TYPES**

**DISTRICT 2 - SKOKIE**

**Court date EMAIL:** D2CourtDate@cookcountycourt.com

Gen. Info: (847) 470-7250

**DISTRICT 3 - ROLLING MEADOWS**

**Court date EMAIL:** D3CourtDate@cookcountycourt.com

Gen. Info: (847) 818-3000

**DISTRICT 4 - MAYWOOD**

**Court date EMAIL:** D4CourtDate@cookcountycourt.com

Gen. Info: (708) 865-6040

**DISTRICT 5 - BRIDGEVIEW**

**Court date EMAIL:** D5CourtDate@cookcountycourt.com

Gen. Info: (708) 974-6500

**DISTRICT 6 - MARKHAM**

**Court date EMAIL:** D6CourtDate@cookcountycourt.com

Gen. Info: (708) 232-4551

Return Date: No return date scheduled  
 Hearing Date: 7/27/2021 9:30 AM - 9:30 AM  
 Courtroom Number: 2308  
 Location: District 1 Court  
 Cook County, IL

\* 5 0 0 6 8 2 2 3 \*  
 FILED  
 3/29/2021 11:23 AM  
 IRIS Y. MARTINEZ  
 CIRCUIT CLERK  
 COOK COUNTY, IL  
 2021CH01474

12746080

2120 - Served	2121 - Served	2620 - Sec. of State
2220 - Not Served	2221 - Not Served	2621 - Alias Sec of State
2320 - Served By Mail	2321 - Served By Mail	
2420 - Served By Publication	2421 - Served By Publication	
Summons - Alias Summons		(12/01/20) CCG 0001 A

### IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Name all Parties

Angela Jordan

Plaintiff(s)

v.

Cavalry SPV I, LLC, and Cavalry Portfolio  
 Services, LLC

Defendant(s)

Cavalry Portfolio Services, LLC  
 208 S. LaSalle St., Suite 814, Chicago, IL 60603

Address of Defendant(s)

2021CH01474

Case No. \_\_\_\_\_

Please serve as follows (check one): ☐ Certified Mail ☒ Sheriff Service ☐ Alias

### SUMMONS

To each Defendant:

You have been named a defendant in the complaint in this case, a copy of which is hereto attached. You are summoned and required to file your appearance, in the office of the clerk of this court, within 30 days after service of this summons, not counting the day of service. If you fail to do so, a judgment by default may be entered against you for the relief asked in the complaint.

### THERE WILL BE A FEE TO FILE YOUR APPEARANCE.

To file your written appearance/answer **YOU DO NOT NEED TO COME TO THE COURTHOUSE.** You will need: a computer with internet access; an email address; a completed Appearance form that can be found at <http://www.illinoiscourts.gov/Forms/approved/procedures/appearance.asp>; and a credit card to pay any required fees.

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois  
[cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org)

**Summons - Alias Summons**

E-filing is now mandatory with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider.

If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/faq/gethelp.asp> or talk with your local circuit clerk's office. If you cannot e-file, you may be able to get an exemption that allows you to file in-person or by mail. Ask your circuit clerk for more information or visit [www.illinoislegalaid.org](http://www.illinoislegalaid.org).

If you are unable to pay your court fees, you can apply for a fee waiver. For information about defending yourself in a court case (including filing an appearance or fee waiver), or to apply for free legal help, go to [www.illinoislegalaid.org](http://www.illinoislegalaid.org). You can also ask your local circuit clerk's office for a fee waiver application.

Please call or email the appropriate clerk's office location (on Page 3 of this summons) to get your court hearing date AND for information whether your hearing will be held by video conference or by telephone. The Clerk's office is open Mon - Fri, 8:30 am - 4:30 pm, except for court holidays.

**NOTE: Your appearance date is NOT a court date. It is the date that you have to file your completed appearance by. You may file your appearance form by e-filing unless you are exempted.**

A court date will be set in the future and you will be notified by email (either to the email address that you used to register for e-filing, or that you provided to the clerk's office).

**CONTACT THE CLERK'S OFFICE** for information regarding **COURT DATES** by visiting our website: [cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org); download our mobile app from the AppStore or Google play, or contact the appropriate clerk's office location listed on Page 3.

To the officer: (Sheriff Service)

This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so endorsed. This summons may not be served later than thirty (30) days after its date.

3/29/2021 11:23 AM IRIS Y. MARTINEZ

Witness date \_\_\_\_\_

● Atty. No.: 41106

○ Pro Se 99500

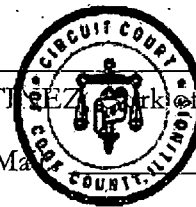
Name: Daniel A. Edelman

Atty. for (if applicable): \_\_\_\_\_

Plaintiff \_\_\_\_\_

Address: 20 S Clark St, Suite 1500City: ChicagoState: IL Zip: 60603Telephone: 312 739 4200Primary Email: courtecl@edcombs.com

IRIS Y. MARTINEZ, Clerk of Court

☐ Service by Certified Mail \_\_\_\_\_
☐ Date of Service: \_\_\_\_\_  
 (To be inserted by officer on copy left with employer or other person)

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois  
[cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org)

**GET YOUR COURT DATE BY CALLING IN OR BY EMAIL**

**CALL OR SEND AN EMAIL MESSAGE** to the telephone number or court date email address below for the appropriate division, district or department to request your next court date. Email your case number, or, if you do not have your case number, email the Plaintiff or Defendant's name for civil case types, or the Defendant's name and birthdate for a criminal case.

**CHANCERY DIVISION**

**Court date EMAIL:** ChanCourtDate@cookcountycourt.com  
Gen. Info: (312) 603-5133

**CIVIL DIVISION**

**Court date EMAIL:** CivCourtDate@cookcountycourt.com  
Gen. Info: (312) 603-5116

**COUNTY DIVISION**

**Court date EMAIL:** CntyCourtDate@cookcountycourt.com  
Gen. Info: (312) 603-5710

**DOMESTIC RELATIONS/CHILD SUPPORT  
DIVISION**

**Court date EMAIL:** DRCourtDate@cookcountycourt.com  
OR  
ChildSupCourtDate@cookcountycourt.com  
Gen. Info: (312) 603-6300

**DOMESTIC VIOLENCE**

**Court date EMAIL:** DVCourtDate@cookcountycourt.com  
Gen. Info: (312) 325-9500

**LAW DIVISION**

**Court date EMAIL:** LawCourtDate@cookcountycourt.com  
Gen. Info: (312) 603-5426

**PROBATE DIVISION**

**Court date EMAIL:** ProbCourtDate@cookcountycourt.com  
Gen. Info: (312) 603-6441

**ALL SUBURBAN CASE TYPES****DISTRICT 2 - SKOKIE**

**Court date EMAIL:** D2CourtDate@cookcountycourt.com  
Gen. Info: (847) 470-7250

**DISTRICT 3 - ROLLING MEADOWS**

**Court date EMAIL:** D3CourtDate@cookcountycourt.com  
Gen. Info: (847) 818-3000

**DISTRICT 4 - MAYWOOD**

**Court date EMAIL:** D4CourtDate@cookcountycourt.com  
Gen. Info: (708) 865-6040

**DISTRICT 5 - BRIDGEVIEW**

**Court date EMAIL:** D5CourtDate@cookcountycourt.com  
Gen. Info: (708) 974-6500

**DISTRICT 6 - MARKHAM**

**Court date EMAIL:** D6CourtDate@cookcountycourt.com  
Gen. Info: (708) 232-4551

Return Date: No return date scheduled  
 Hearing Date: 7/27/2021 9:30 AM - 9:30 AM  
 Courtroom Number: 2308  
 Location: District 1 Court  
 Cook County, IL

\* 5 0 0 6 8 2 2 3 \*  
 FILED  
 3/29/2021 11:23 AM  
 IRIS Y. MARTINEZ  
 CIRCUIT CLERK  
 COOK COUNTY, IL  
 2021CH01474

12746080

Chancery Division Civil Cover Sheet  
 General Chancery Section

(12/01/20) CCCH 0623

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
 COUNTY DEPARTMENT, CHANCERY DIVISION

Angela Jordan

Plaintiff

v.

2021CH01474

Case No: \_\_\_\_\_

Cavalry SPV I, LLC, and Cavalry Portfolio Services, LLC

Defendant

CHANCERY DIVISION CIVIL COVER SHEET  
 GENERAL CHANCERY SECTION

A Chancery Division Civil Cover Sheet - General Chancery Section shall be filed with the initial complaint in all actions filed in the General Chancery Section of Chancery Division. The information contained herein is for administrative purposes only. Please check the box in front of the appropriate category which best characterizes your action being filed.

Only one (1) case type may be checked with this cover sheet.

0005 ☐ Administrative Review0017 ☐ Mandamus0001 ☒ Class Action0018 ☐ Ne Exeat0002 ☐ Declaratory Judgment0019 ☐ Partition0004 ☐ Injunction0020 ☐ Quiet Title0007 ☐ General Chancery0021 ☐ Quo Warranto0010 ☐ Accounting0022 ☐ Redemption Rights0011 ☐ Arbitration0023 ☐ Reformation of a Contract0012 ☐ Certiorari0024 ☐ Rescission of a Contract0013 ☐ Dissolution of Corporation0025 ☐ Specific Performance0014 ☐ Dissolution of Partnership0026 ☐ Trust Construction0015 ☐ Equitable Lien0050 ☐ Internet Take Down Action (Compromising Images)0016 ☐ Interpleader☐ Other (specify) \_\_\_\_\_

☐ Atty. No.: 41106 ☐ Pro Se 99500

Pro Se Only: ☐ I have read and agree to the terms of the Clerk's  
 Clerk's Office Electronic Notice Policy and  
 choose to opt in to electronic notice from the  
 Clerk's office for this case at this email address:

Atty Name: Daniel A. Edelman

Atty. for: Plaintiff

Address: 20 S Clark St, Suite 1500

Email: \_\_\_\_\_

City: Chicago State: IL

Zip: 60603

Telephone: (312) 739 4200

Primary Email: courtecl@edcombs.com

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois  
 cookcountyclerkofcourt.org



Atty. No. 41106

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

ANGELA JORDAN,  
on behalf of Plaintiff  
and the class members described herein,

Plaintiff,

vs.

CAVALRY SPV I, LLC, and CAVALRY  
PORTFOLIO SERVICES, LLC,

Defendants.

2021CH01474

FILED  
3/29/2021 11:23 AM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
2021CH01474

Hearing Date: 7/27/2021 9:30 AM - 9:30 AM  
Courtroom Number: 2308  
Location: District 1 Court  
Cook County, IL

**COMPLAINT – CLASS ACTION**

1. Plaintiff Angela Jordan brings this action to secure redress from unlawful collection practices engaged in by Defendants Cavalry SPV I, LLC, and Cavalry Portfolio Services, LLC. Plaintiff alleges violation of the Fair Debt Collection Practices Act, 15 U.S.C. §1692 et seq. (“FDCPA”).

2. The FDCPA broadly prohibits unfair or unconscionable collection methods, conduct which harasses or abuses any debtor, and the use of any false or deceptive statements in connection with debt collection attempts. It also requires debt collectors to give debtors certain information. 15 U.S.C. §§1692d, 1692e, 1692f and 1692g.

3. In enacting the FDCPA, Congress found that: “[t]here is abundant evidence of the use of abusive, deceptive, and unfair debt collection practices by many debt collectors. Abusive debt collection practices contribute to the number of personal bankruptcies, to marital instability, to the loss of jobs, and to invasions of individual privacy.” 15 U.S.C. §1692(a).

4. Because of this, courts have held that “the FDCPA's legislative intent emphasizes the need to construe the statute broadly, so that we may protect consumers against debt

collectors' harassing conduct.” and that “[t]his intent cannot be underestimated.” *Ramirez v. Apex Financial Management LLC*, 567 F.Supp.2d 1035, 1042 (N.D.Ill. 2008).

5. The FDCPA encourages consumers to act as "private attorneys general" to enforce the public policies and protect the civil rights expressed therein. *Crabill v. Trans Union, LLC*, 259 F.3d 662, 666 (7th Cir. 2001).

6. Plaintiff seeks to enforce those policies and civil rights which are expressed through the FDCPA, 15 U.S.C. §1692 *et seq.*

### **PARTIES**

7. Cavalry SPV I, LLC is a limited liability company chartered under the law of Delaware with its principal office at 500 Summit Lake Dr., #400, Valhalla, NY 10595-1340. It does business in Illinois. Its registered agent and office is C T Corporation System, 208 S. LaSalle St., Suite 814, Chicago, IL 60604.

8. Cavalry SPV I, LLC is a “special purpose vehicle” created to engage in and engaged in the sole business of buying and liquidating charged-off consumer debts. In some cases it uses collection agencies to dun consumers. In addition, it files numerous collection lawsuits against consumers in its own name.

9. During the year prior to the filing of this action, Cavalry SPV I, LLC has filed:

- a. Over 3,200 collection lawsuits in Cook County alone (Appendix A);
- b. Hundreds more in other Illinois counties (Appendix B).

10. Cavalry SPV I, LLC holds a collection license from the state of Illinois.

11. The mails and telephone system are used in connection with such collection litigation.

12. The principal purpose and sole source of revenue of Cavalry SPV I, LLC is the liquidation of consumer debts.

13. The debts are acquired in large portfolios containing debts of similar type and age. They are not purchased individually.

14. Cavalry SPV I, LLC is a debt collector as defined in the FDCPA.

15. Defendant Cavalry Portfolio Services, LLC is a limited liability company chartered under Delaware law with its principal place of business at 4050 E. Cotton Ctr. Bldg. 2, Suite 20, Phoenix, AZ 85040. It does business in Illinois. Its registered agent and office is C T Corporation System, 208 S. LaSalle St., Suite 814, Chicago, IL 60604.

16. Defendant Cavalry Portfolio Services, LLC is engaged in the business of a collection agency.

17. Cavalry Portfolio Services, LLC collects and supervises the collection of debts for several Cavalry "special purpose vehicles," of which Cavalry SPV I, LLC is one.

18. Cavalry Portfolio Services, LLC has a website on which it states, "Founded in 2002, Cavalry is a leader in the acquisition and management of non-performing consumer loan portfolios." (<https://www.cavalryportfolioservices.com/About>)

19. Cavalry Portfolio Services, LLC hires and supervises outside law firms and collection agencies to dun consumers and file lawsuits on behalf of Cavalry SPV I, LLC.

20. Several of these law firms are located or practice in Cook County.

21. Defendant Cavalry Portfolio Services, LLC holds a number of collection agency licenses from various jurisdictions, including Illinois.

22. The mails and telephone system are used in connection with the collection of debts and prosecution of collection litigation by Cavalry Portfolio Services, LLC.

23. Defendant Cavalry Portfolio Services, LLC is a debt collector as defined in the FDCPA.

### FACTS

24. On December 3, 2020, Cavalry SPV I, LLC filed Case No. 20 SC 5851 in DuPage County Circuit Court against Angela Jordan. The complaint (Appendix C) sought to collect an alleged balance on a credit card incurred for personal, family or household purposes and not for business purposes.

25. Attached to the complaint was an affidavit (Appendix D) executed by an employee of Cavalry Portfolio Services, LLC and listing, among other things, "Payments/ Credits/ Adjustments since Charge-off Date."

26. The affidavits in all cases filed by Cavalry SPV I, LLC are executed by an employee of Cavalry Portfolio Services, LLC.

27. Since late 2018, Defendants have engaged in a pattern and practice of filling out the affidavits to reflect small purported "credits and/or payments" or "adjustments" that do not reflect any "activity on the account" attributable to the consumer.

28. In the case of Angela Jordan, the affidavit was filled out, under "Payments/ Credits/ Adjustments Since Charge-off Date," with the sum of \$63.24.

29. The charge-off date was listed as May 10, 2017.

30. Angela Jordan never made any such payment.

31. Angela Jordan never did anything to request or cause a credit or adjustment in that or any similar amount to be applied to the account.

32. In fact, Defendants have engaged in a pattern and practice of filing collection complaints and filling out the accompanying affidavits to reflect small purported "credits and/or payments" that do not reflect any activity on the account which is attributable to the consumer, without disclosing that fact.

33. Defendants created and inserted numbers for "credits" in the affidavits, which are

not attributable to the consumer/debtor.

34. The collection complaint filed against Angela Jordan (Appendix C) alleged that periodic statements were sent to her, setting forth all charges and credits and that Angela Jordan did not object to their accuracy.

35. All collection complaints filed by Defendants in Illinois allege that statements were sent to the consumer reflecting all activity on the account and not objected to.

36. The implication of the \$63.24, coupled with the other complaint allegations, is that the \$63.24 represents actual activity on the account, is attributable to the consumer, and represents:

- a. An event amounting to an admission that the remaining balance claimed is due;
- b. An event which would extend the statute of limitations.

37. Most credits applied to credit card accounts *are* the result of actions attributable to the consumer, such as the return of merchandise, the cancellation of orders, or the discontinuation of service contracts, and may legitimately have the same effect as a payment.

38. The ones at issue do not.

39. The inclusion of “credits” which post-date any actual account activity by the consumer, without disclosure of the material fact that the “credit” did not result from anything attributable to the consumer, has the effect of creating a false appearance of an act that is an admission or a purported extension of the statute of limitations, and is deceptive.

40. Defendants have engaged in this conduct as a regular practice.

41. Other cases where this took place include:

- a. *Cavalry SPV I v. Esposito*, 20 AR 1522 (DuPage Co.);
- b. *Cavalry SPV I v. Askew*, 20 SC 5549 (Will Co.);

- c. *Cavalry SPV I v. Biedrzycki*, 20 M1 117171 (Cook Co.);
- d. *Cavalry SPV I v. Rogers*, 19 SC 5622 (DuPage Co.);
- e. *Cavalry SPV I v. Shanklin*, 20 SC 133 (Will Co.);
- f. *Cavalry SPV I v. Villanueva*, 2019 M6 12633 (Cook Co.);
- g. *Cavalry SPV I v. Kidd*, 19 M6 6383 (Cook Co.);
- h. *Cavalry SPV I v. Snyder*, 19 AR 224 (Will Co.);
- i. *Cavalry SPV I v. Bickel*, 19 SC 1209 (McHenry Co.);
- j. *Cavalry SPV I v. Rodriguez*, 19 M4 2223 (Cook Co.);
- k. *Cavalry SPV I v. Anderson*, 18 SC 1347 (Kendall Co.);
- l. *Cavalry SPV I v. Almon*, 18 M5 8376 (Cook Co.);
- m. *Cavalry SPV I v. Nimeh*, 20 M2 3630 (Cook Co.);
- n. *Cavalry SPV I v. Trotman*, 20 SC 1313 (McHenry Co.);
- o. *Cavalry SPV I v. Ceballos*, 20 M1 127859 (Cook Co.);

42. On information and belief, at least half the cases in which the practice complained of was carried out are in Cook County.

#### **COUNT I – FDCPA – CLASS CLAIM**

43. Plaintiff incorporates paragraphs 1-42.

44. Defendants violated 15 U.S.C. §§1692e, 1692e(2) and 1692e(10), by inserting “Payments/ Credits/ Adjustments Since Charge-off Date” in the affidavits required to accompany Illinois collection complaints, which “Payments/ Credits/ Adjustments Since Charge-off Date” do not reflect any activity attributable to the consumer, without disclosure of that fact.

45. The insertion of small fictitious credits to extend the statute of limitations or create the illusion of an admission has long been recognized as a deceptive device used by

creditors or debt collectors. *E.g.*, *Keel v. Rudisell*, 7 Ohio C.D. 464, 466, 13 Ohio C.C. 199, 1896 WL 1483, at \*2 (Cir. Ct. Dec. 1896); *First Nat. Bank of Wood River v. Carstens*, 346 Ill.App. 474, 105 N.E.2d 786 (4th Dist. 1952).

46. Section 1692e provides:

False or misleading representations

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section: . . .

(2) The false representation of—

(A) the character, amount, or legal status of any debt; . . .

(10) The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer. . . .

### **CLASS ALLEGATIONS**

47. Plaintiff brings this action on behalf of a class.

48. The class consists of (a) all individuals (b) against whom a collection complaint was filed in an Illinois court by Cavalry SPV I, LLC or with an affidavit signed by an employee of Cavalry Portfolio Services, LLC, (c) where the affidavit accompanying the complaint listed under “Payments/ Credits/ Adjustments Since Charge-off Date” or similar caption sums which do not reflect any activity attributable to the consumer (d) without disclosure of the fact that they are not attributable to the consumer (e) which complaints were filed at any time during a period beginning one year prior to the filing of this action and ending 21 days after the filing of this action.

49. On information and belief, based on the volume of Defendants’ collection lawsuits, there are more than 50 members of the class, and the class is so numerous that joinder of all members is not practicable.

50. There are questions of law and fact common to the class members, which common questions predominate over any questions relating to individual class members. The predominant common questions are:

- a. Whether Defendants engage in the practice described;
- b. Whether the practice violates the FDCPA.

51. Plaintiff will fairly and adequately represent the class members.  
Plaintiff has retained counsel experienced in class actions and FDCPA litigation.

52. A class action is appropriate for the fair and efficient adjudication of this matter, in that:

- a. Individual actions are not economically feasible.
- b. Members of the class are likely to be unaware of their rights;
- c. Congress intended class actions to be the principal enforcement mechanism under the FDCPA.

WHEREFORE, the Court should enter judgment in favor of Plaintiff and the class and against Defendants for:

- i. Statutory damages;
- ii. Attorney's fees, litigation expenses and costs of suit;
- iii. Such other and further relief as the Court deems proper.

**COUNT II – FDCPA – INDIVIDUAL CLAIM**

53. Plaintiff incorporates paragraphs 1-42.

54. Case No. 20 SC 5851 was the third case based on the same cause of action by Cavalry SPV I, LLC with the assistance and involvement of Cavalry Portfolio Services, Inc.

55. The same cause of action was previously the subject of Case No. 19 SC 4307, filed August 1, 2019 and dismissed on February 26, 2020, and Case No. 18 SC 4328, filed July



20, 2018 and dismissed on February 14, 2019.

56. A copy of the complaint in 18 SC 4328 is in Appendix E. A copy of the complaint in 19 SC 4307 is in Appendix F. The docket showing dismissal of 18 SC 4328 is in Appendix G. The docket showing dismissal of 19 SC 4307 is in Appendix H.

57. Illinois allows only one refiling of a cause of action that is voluntarily dismissed or dismissed for want of prosecution. 735 ILCS 5/13-217; *First Midwest Bank v. Cobo*, 2018 IL 123038, ¶ 17, 124 N.E.3d 926; *McHenry Sav. Bank v. Moy*, 2021 IL App (2d) 200099, ¶ 26.

58. The filing by a debt collector of an action barred by res judicata or similar principles violates 15 U.S.C. § 1692e, 1692e(2), 1692e(10), 1692f and 1692f(1). *Montgomery v. Donnett*, 1:05cv00476, 2006 U.S. Dist. LEXIS 7377, \*4-5, 2006 WL 293727 (S.D. Ohio Feb. 7, 2006) (res judicata); *Donley v. Nordic Properties, Inc.*, 99cv4677, 2003 U.S. Dist. LEXIS 17430, \*9-11, 2003 WL 22282523 (N.D. Ill., Sept. 30, 2003) (same). *Tevere v. Weltman, Weinberg & Reis, Co.*, 17cv2455, 2019 U.S. Dist. LEXIS 92738, 2019 WL 2341389 (N.D.Ill., June 3, 2019) (single refiling rule); *Bauer v. Roundpoint Mortg. Servicing Corp.*, 18cv3634, 2018 U.S. Dist. LEXIS 184328, 2018 WL 5388206 (N.D.Ill., Oct. 29, 2018) (same), “[T]he FDCPA would preclude a debt collector from attempting to collect a debt that it had no right to collect regardless of the reason that it did not have that right,” *McCrobie v. Palisades Acquisition XVI, LLC*, 359 F. Supp. 3d 239, 247 (W.D.N.Y. 2019).

59. Section 1692f provides:

A debt collector may not use unfair or unconscionable means to collect or attempt to collect any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section:

(1) The collection of any amount (including any interest, fee, charge, or expense incidental to the principal obligation) unless such amount is expressly authorized by the agreement creating the debt or permitted by law. . . .

60. The third refiling of the same cause of action caused damage to Plaintiff, in that

she was required to spend time and money retaining counsel and defending the case.

WHEREFORE, the Court should enter judgment in favor of Plaintiff and the class and against Defendants for:

- i. Statutory damages;
- ii. Actual damages;
- iii. Attorney's fees, litigation expenses and costs of suit;
- iv. Such other and further relief as the Court deems proper.

/s/ Daniel A. Edelman  
Daniel A. Edelman

Daniel A. Edelman (ARDC 0712094)  
Cathleen M. Combs (ARDC 0472840)  
David Kim (ARDC 6303707)  
**EDELMAN, COMBS, LATTURNER & GOODWIN, LLC**  
20 South Clark Street, Suite 1500  
Chicago, IL 60603-1824  
(312) 739-4200  
(312) 419-0379 (FAX)  
Email address for service: [courtecl@edcombs.com](mailto:courtecl@edcombs.com)  
Atty. No. 41106 (Cook)

T:\37682\Pleading\Complaint DAE 3-22-21\_Pleading.WPD

**NOTICE OF LIEN AND ASSIGNMENT**

Please be advised that we claim a lien upon any recovery herein for 1/3 or such amount as a court awards. All rights relating to attorney's fees have been assigned to counsel.

/s/ Daniel A. Edelman  
Daniel A. Edelman

Daniel A. Edelman  
EDELMAN, COMBS, LATTURNER  
& GOODWIN, LLC  
20 S. Clark Street, Suite 1500  
Chicago, Illinois 60603  
(312) 739-4200  
(312) 419-0379 (FAX)

# **APPENDIX A**



CourtLink



cavalry /2 spv AND COOK /2 COUNT



Dockets



Client: 00430 ✓

History

Help

More

Results for: cavalry /2 spv AND COOK /2 COUNTY | Actions ✓

Dockets

3,257

## Narrow By

After Jan 15, 2020

X

Open or Unknown or Closed

X

Illinois State

X

Contract

X

Clear

## &gt; Filter Results

Dockets (3,257)



Sort by: Date (newest-oldest) ✓

- ☐ 1. CAVALRY SPV I, LLC vs. WILLIAMS FRED 60  
Cook County Circuit Court | Jan 06, 2021 | 2021-M1-100256 | CONTRACT | Pending

---

- ☐ 2. CAVALRY SPV I, LLC vs. VERGARA RONALD  
Cook County Circuit Court | Jan 06, 2021 | 2021-M2-000041 | CONTRACT | Pending

---

- ☐ 3. CAVALRY SPV I, LLC vs. PEREPECZA JOANNA  
Cook County Circuit Court | Jan 06, 2021 | 2021-M5-000052 | CONTRACT | Pending

---

- ☐ 4. CAVALRY SPV I, LLC vs. MUNOZ NICK  
Cook County Circuit Court | Jan 06, 2021 | 2021-M3-000035 | CONTRACT | Pending

---

- ☐ 5. CAVALRY SPV I, LLC vs. MASSEY VALLARIE A  
Cook County Circuit Court | Jan 06, 2021 | 2021-M1-100241 | CONTRACT | Pending

---

- ☐ 6. CAVALRY SPV I, LLC vs. LOPEZ DANIEL V  
Cook County Circuit Court | Jan 06, 2021 | 2021-M1-100253 | CONTRACT | Pending

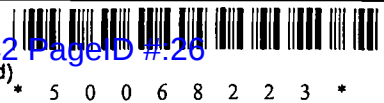
---

- ☐ 7. CAVALRY SPV I, LLC vs. GARCIA SUSANA C  
Cook County Circuit Court | Jan 06, 2021 | 2021-M5-000053 | CONTRACT | Pending

---

- ☐ 8. CAVALRY SPV I, LLC vs. CHIA MEGAN D  
Cook County Circuit Court | Jan 06, 2021 | 2021-M1-100258 | CONTRACT | Pending

---



- ☐ 9. CAVALRY SPV I, LLC vs. BROWN SHAQUILLA M  
Cook County Circuit Court | Jan 06, 2021 | 2021-M6-000063 | CONTRACT | Pending

- 
- ☐ 10. CAVALRY SPV I, LLC vs. SHANNON LEONA  
Cook County Circuit Court | Jan 04, 2021 | 2021-M5-000024 | CONTRACT | Pending
- 



[About](#)  
[Privacy Policy](#)

[Cookie Policy](#)  
[Terms & Conditions](#)



Copyright © 2021 LexisNexis.

## **APPENDIX B**

1/7/2021

295 results for cavalry /2 spv AND kane /2 COUNTY and date &gt; 1/15/2020

\* 5 0 0 6 8 2 2 3 \*



CourtLink



cavalry /2 spv AND kane /2 COUNTY and date &gt; 1/15/2020



Dockets



Client: 00430

History

Help

More

Results for: cavalry /2 spv AND kane /2 COUNTY and date &gt; 1/15/2020 | Actions

Dockets

295

Narrow By

&gt; Filter Results

Dockets (295)



Sort by: Date (newest-oldest)

- ☐ 1. Cavalry SPV I, LLC v. Jeffrey Howicz  
Kane County Circuit Court | Jan 06, 2021 | 21-SC-000018 | Contract (\$2,500.01 to \$10K) | Open

---

- ☐ 2. Cavalry SPV I, LLC as assignee of Citibank, N.A. v. Zach Wade  
Kane County Circuit Court | Jan 04, 2021 | 21-SC-000007 | Contract (\$2,500.01 to \$10K) | Open

---

- ☐ 3. Cavalry SPV I, LLC v. William Severino  
Kane County Circuit Court | Dec 17, 2020 | 20-SC-003823 | Contract (Up to \$2,500) | Open

---

- ☐ 4. Cavalry SPV I, LLC, as assignee of Citibank, N.A. v. Theo Calicdan  
Kane County Circuit Court | Dec 03, 2020 | 20-SC-003708 | Contract (Up to \$2,500) | Open

---

- ☐ 5. Cavalry SPV I, LLC, as assignee of Citibank, N.A. v. Jose Flores Pena  
Kane County Circuit Court | Dec 03, 2020 | 20-SC-003707 | Contract (\$2,500.01 to \$10K) | Open

---

- ☐ 6. Cavalry SPV I, LLC, as assignee of Citibank, N.A. v. Miguel Juarez, SR  
Kane County Circuit Court | Nov 30, 2020 | 20-SC-003684 | Contract (\$2,500.01 to \$10K) | Open

---

- ☐ 7. Cavalry SPV I, LLC, as assignee of Citibank, N.A. v. Juan Romero  
Kane County Circuit Court | Nov 30, 2020 | 20-SC-003681 | Contract (\$2,500.01 to \$10K) | Open

---

- ☐ 8. Cavalry SPV I, LLC, as assignee of Citibank, N.A. v. Jennifer Lamplough  
Kane County Circuit Court | Nov 30, 2020 | 20-SC-003682 | Contract (\$2,500.01 to \$10K) | Open

---

- ☐ 9. Cavalry SPV I, LLC, as assignee of Citibank, N.A. v. Amanda Campbell  
Kane County Circuit Court | Nov 30, 2020 | 20-SC-003683 | Contract (\$2,500.01 to \$10K) | Open

---

- ☐ 10. Cavalry SPV I, LLC v. ZEESHAN MEHDI  
Kane County Circuit Court | Nov 20, 2020 | 20-SC-003634 | Contract (\$2,500.01 to \$10K) | Open





1/7/2021

295 results for cavalry /2 spv AND kane /2 COUNTY and date > 1/15/2020

\* 5 0 0 6 8 2 2 3 \*



[Privacy Policy](#)

[Terms & Conditions](#)

Copyright © 2021 LexisNexis.

# APPENDIX C

Candice Adams  
e-filed in the 18th Judicial Circuit Court  
DuPage County  
ENVELOPE: 11299496  
2020SC005851  
FILEDATE: 11/30/2020 4:23 PM  
Date Submitted: 11/30/2020 4:23 PM  
Date Accepted: 12/1/2020 8:07 AM  
JK

IN THE CIRCUIT COURT FOR THE 18TH JUDICIAL DISTRICT  
DUPAGE COUNTY, ILLINOIS

CAVALRY SPV I, LLC, AS ASSIGNEE OF CITIBANK, N.A.,  
Plaintiff,

Case No. 2020SC005851

v.

Amount Claimed \$4,368.82  
plus Costs

ANGELA L JORDAN  
Defendant,

Complaint  
Account Stated

NOW comes Plaintiff, Cavalry SPV I, LLC by and through its counsel, Mandarich Law Group, LLP, and in support of its claim against ANGELA L JORDAN states as follows:

1. That Plaintiff, Cavalry SPV I, LLC is a foreign LLC registered to conduct business in the State of Illinois.
2. That Defendant ANGELA L JORDAN is an individual believed to be a resident of Dupage County, Illinois at the commencement of this cause and venue is proper in the Circuit Court of Dupage County, Illinois.
3. That on or about May 15, 2012, a Credit Card was issued by Citibank, N.A.. The Credit Card was designated by account number XXXXXXXXXXXXX3730.
4. That Citibank, N.A. and Defendant engaged in previous transactions of a monetary nature and the existence of accounts embodying said monetary transactions are set forth more fully in copies of the monthly billing statements attached hereto and by reference incorporated herein, Defendant used the credit card to make purchases and/or receive cash advances.
5. That the monthly billing statements are true and accurate, were sent to the Defendant and were retained by the Defendant without objection creating an account stated.
6. That Defendant expressly and or impliedly promised to pay for the charges incurred by use of the credit card, and based on this promise, Citibank, N.A. paid the merchants for the charges incurred by Defendant by his use of the credit card.

This communication is from a debt collector and is an attempt to collect a debt.



7. That Defendant defaulted on his/her obligation to make payments on the Credit Card account having made his last payment on or about October 10, 2016 and the account was subsequently charged off to Profit and Loss by Citibank, N.A. on or about May 10, 2017.

8. That Plaintiff, Cavalry SPV I, LLC became owner of the charged off account by virtue of a purchase of Defendant's credit card account by Plaintiff from Citibank, N.A. on or about September 29, 2017 as evidenced by the Bill of Sale attached hereto as Exhibit 2 and by reference incorporated herein.

9. That all credits and payments have been properly applied. Defendant is not entitled to any additional credits or set offs on the account of any kind and the balance set forth herein is currently due and owing.

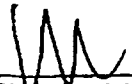
10. That demand has been made on Defendant to pay the balance due and owing by Plaintiff's counsel and said demand for payment has been refused.

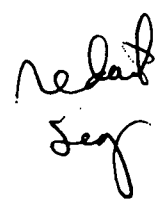
11. This suit is filed within the relevant statute of limitations.

WHEREFORE, Plaintiff, Cavalry SPV I, LLC prays that this Honorable Court enter an Order granting the following relief:

- A. That judgment be entered in favor of Plaintiff, Cavalry SPV I, LLC and against ANGELA L JORDAN in the amount of \$4,368.82.
- B. That Costs of Suit be awarded Plaintiff.
- C. Any further relief that this Honorable Court deems is fair and equitable.

Attorney No.: 312708  
Mandarich Law Group, LLP  
P.O. Box 109032, Chicago, IL 60610  
877.285.4918  
Email: Illinois@mandarichlaw.com

  
[X] Christina Milien  
[X] Claire Whitlatch  
[X] Chase Pekar  
[X] George Petrilli  
Attorneys For Plaintiff



## **APPENDIX D**

Cavalry SPV I, LLC  
Plaintiff,

2020SC005851

v

ANGELA L JORDAN

Candice Adams  
e-filed in the 18th Judicial Circuit Court  
DuPage County  
ENVELOPE: 11299496  
2020SC005851  
FILEDATE: 11/30/2020 4:23 PM  
Date Submitted: 11/30/2020 4:23 PM  
Date Accepted: 12/1/2020 8:07 AM  
JK

Defendant

**CREDIT CARD OR DEBT BUYER COLLECTION ACTION AFFIDAVIT  
(SUPREME COURT RULE 280.2)**

Comes now affiant, and states:

I, Giovanni Rodriguez, am a designated representative of Cavalry SPV I, LLC ("Plaintiff"); I am an employee of Cavalry Portfolio Services, LLC ("CPS"). CPS performs collection services for Plaintiff.

I am of adult age and am fully authorized by Plaintiff to make the following representations. I am familiar with the record keeping practices of CPS and Plaintiff. The following representations are true according to documents kept in the normal course of CPS' and Plaintiff's business:

**I. IDENTIFICATION ABOUT THE CONSUMER DEBT OR ACCOUNT**

Complete the tables.

a. As of charge-off date:

Full name of the creditor	Full name of the Defendant(s) as it appears on the account	Last four digits of the account number	Date the account was opened or the debt originated	Nature of the debt, (credit card debt, payday loan, retail installment loan, etc.)
Citibank, N.A.	ANGELA L JORDAN	3730	05/15/2012	REVOLVING

b. The most recent activity on the account prior to or after charge-off, includes:

Charge-off Balance as defined by ISCR 280.1(c)	Charge-off Date	Date of Last Payment (on or about)*	Amount of Last Payment	Payments/Credits/ Adjustments Since Charge-off Date**
\$4,432.06	05/10/2017	10/10/2016	\$142.88	\$63.24

\*Last Payment on the account, pre- or post-charge-off

\*\*Credits, payments or adjustments made within 30 days of the signing of this affidavit may not be reflected

c. For a revolving credit account, Plaintiff further certifies that it has in its possession and can produce on request the most recent monthly statement recording a purchase, transaction, last payment, or balance transfer

**2. PROOF OF OWNERSHIP OR RIGHT TO SUE FOR DEBT BUYERS**

Complete the table and list the prior owners or creditors since the charge-off date. Start with the first assignment through the current creditor or owner of the consumer debt. List in chronological order, beginning with the first assignment:

From (Name)	To (Name)	Date of Assignment (on or about)
Citibank, N.A.	Cavalry SPV I, LLC	09/29/2017

☐ Does not apply — Plaintiff is the charge-off creditor.

**3. ADDITIONAL ACCOUNT INFORMATION AFTER CHARGE-OFF**

Plaintiff is seeking additional amounts after the charge-off date:

☒ No\*

☐ Yes.

☐ Total amount of interest accrued: \$ \_\_\_\_\_;

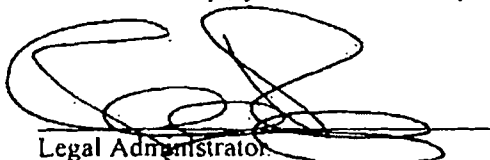
☐ Total amount of non-interest charges or fee accrued \$ \_\_\_\_\_;

☐ Plaintiff is seeking attorney's fees in the amount of \$ \_\_\_\_\_;

Balance due and owing as of 07/07/2020: \$4,368.82

\*Costs prayed for in the Complaint will not be reflected.

*redact*  
*sig*

  
Legal Administrator

7/14/2020

Subscribed and sworn to before me on 7/14/2020

  
NOTARY PUBLIC, STATE OF NEW YORK

Dawn M Ryder  
Notary Public - State of New York  
No. 01RY6091579  
Qualified in Westchester County  
Commission Expires April 28, 2023



## **APPENDIX E**





## IN THE CIRCUIT COURT OF DUPAGE COUNTY, ILLINOIS

Cavalry SPV I, LLC

Plaintiff,

vs.

No. 2018SC004328

Return Date:

Angela L Jordan

Defendant(s).

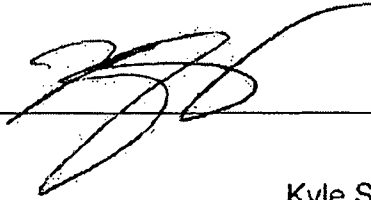
Amount Claimed: \$4,368.82  
Plus Court CostsCOMPLAINT

Plaintiff, Cavalry SPV I, LLC, by its attorneys, Blitt and Gaines PC, as and for its complaint herein against Defendant(s), hereby alleges as follows:

1. The Defendant(s) utilized a charge account and/or line of credit issued by Citibank, N.A. or its predecessor in interest, which was opened on May 15, 2012.
2. The last four digits of the account number at time of charge off was \*\*\*\*\*3730.
3. Periodic statements were sent to Defendant(s) by regular or electronic mail which set forth in detail, all debits and credits, the total balance due, the interest rate and the minimum payment.
4. Defendant(s) eventually failed to make the minimum payment(s).
5. Attached hereto and incorporated herein as Exhibit "1" is a copy of the last periodic statement provided to Defendant prior to charge-off.
6. Defendant(s) did not object to the statement, indicate that the statement contains an error, nor indicate that it was erroneous in any respect within a reasonable period of time.
7. Plaintiff was assigned all rights and title to the account. Plaintiff is currently the bona fide owner thereof.
8. After receiving all payments, debits, credits and set offs, there is now due and owing from Defendant(s) to Plaintiff the sum of \$4,368.82.
9. By reason of the foregoing, Plaintiff is entitled to judgment against Defendant(s) for Account Stated in the sum of \$4,368.82, plus court costs.
10. Despite due demand, Defendant(s) have failed and/or refused to pay the amount due and owing as indicated on the final statement.

WHEREFORE, the Plaintiff, requests judgment against Defendant(s) for Account Stated in the sum of \$4,368.82, plus court costs; and for such other and further relief as this Court deems just and proper.

Blitt and Gaines, P.C.  
Attorney at Law  
661 Glenn Avenue  
Wheeling, IL 60090  
(888) 920-0620  
pleadings2@blittandgaines.com  
18044452  
22225

A handwritten signature in black ink, appearing to be 'KS', is written over a horizontal line.

Kyle Sellett  
ARDC# 6321485

This is an attempt to collect a debt by a debt collector and any information obtained will be used for that purpose.

## **APPENDIX F**

Chris Kachiroubas  
e-filed in the 18th Judicial Circuit Court 2 3 \*  
DuPage County  
ENVELOPE: 6011129  
2019SC004307  
FILEDATE: 8/1/2019 2:04 PM  
Date Submitted: 8/1/2019 2:04 PM  
Date Accepted: 8/1/2019 2:23 PM  
JK

383655

IN THE CIRCUIT COURT OF THE 18TH JUDICIAL DISTRICT  
DUPAGE COUNTY, ILLINOIS

Cavalry SPV I, LLC,  
  
Plaintiff,

vs.

ANGELA L JORDAN,  
  
Defendant.

)  
)  
)  
) No. 2019SC004307  
)  
) Return Date: \_\_\_\_\_  
)  
) Amount Claimed: \$4,368.82, Plus court Costs

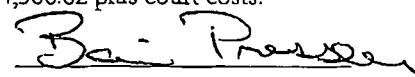
## SMALL CLAIMS COMPLAINT

NOW COMES the Plaintiff, Cavalry SPV I, LLC, by and through their attorneys, Shindler & Joyce, and complaining of the Defendant, states as follows:

1. The Defendant ANGELA L JORDAN, opened a credit card or line of credit account on 05/15/2012 whereby Defendant received a credit card or line of credit and could charge goods and services to their account and receive cash advances.
2. The Defendant subsequently defaulted by failing to pay for the indebtedness incurred resulting in the balance due in the amount of \$4,368.82.
- 3 For valuable consideration, Cavalry SPV I, LLC is the assignee and bona fide owner of all right title and interest to defendant's account.
4. Due demand has been made on the Defendant to pay the amount due and owing and the Defendant has failed to do so.
5. Suit has been filed within a relevant statute of limitations.

WHEREFORE, Plaintiff prays for judgment against the Defendant for \$4,368.82 plus court costs.

Shindler & Joyce  
1990 E. Algonquin Rd Suite 180  
Schaumburg, IL 60173  
(847) 537-1000  
Cook County #: 27053  
DuPage County#: 21020  
attorneys@shindlerlaw.com



**Barrie Pressler**  
**ARDC # 6208258**

**CHRIS KACHIROUBAS, CLERK OF THE 18TH JUDICIAL CIRCUIT COURT**  
**WHEATON, ILLINOIS 60189-0707**





\* 5 0 0 6 8 2 2 3 \*

## **APPENDIX G**



## 18TH JUDICIAL CIRCUIT COURT CLERK

### DUPAGE COUNTY ILLINOIS

### Case Summary Details

#### Case Details

<b>Case Number</b>	2018SC004328	<b>Next Court Date</b>									
<b>File Date</b>	07-20-2018	<b>Next Court Location</b>									
<b>Case Title</b>	CAVALRY SPV I LLC -VS- ANGELA L JORDAN	<b>Next Court Time</b>									
<b>Agency</b>	Clerks Office	<b>Assigned Location</b>	COURTROOM 2000								
<b>Legal Status</b>	CLOSED	<b>Address Change</b>	<a href="#">Change Address Only (addressChange.do)</a>								
<b>Balance Due Amount</b>	\$0.00										
<b>Counts</b>	<table><thead><tr><th>Count Number</th><th>Count Description</th><th>Count Status</th><th>Complaint Number</th></tr></thead><tbody><tr><td>0001</td><td>CONTRACT \$2,500.01 - \$5,000</td><td>CLOSED</td><td></td></tr></tbody></table>			Count Number	Count Description	Count Status	Complaint Number	0001	CONTRACT \$2,500.01 - \$5,000	CLOSED	
Count Number	Count Description	Count Status	Complaint Number								
0001	CONTRACT \$2,500.01 - \$5,000	CLOSED									



\* 5 0 0 6 8 2 2 3 \*

## List of Case Events

File Date	Count Number	Description
02-14-2019	0001	DWP (ViewActivityCodeDetail.jsp? caseNumber=2018SC004328&activityTypeCode=1790&countNumber=0001&fileDate=02-14-2019&subNumber=30&version=1)
08-03-2018	0000	DOCUMENT NOT SERVED (ViewActivityCodeDetail.jsp? caseNumber=2018SC004328&activityTypeCode=9555&countNumber=0000&fileDate=08-03-2018&subNumber=24&version=1) - - SUMMONS
07-20-2018	0000	APPEARANCE (ViewActivityCodeDetail.jsp? caseNumber=2018SC004328&activityTypeCode=5190&countNumber=0000&fileDate=07-20-2018&subNumber=8&version=1)
07-20-2018	0000	NEW CASE COMPLAINT PETITION (ViewActivityCodeDetail.jsp? caseNumber=2018SC004328&activityTypeCode=5350&countNumber=0000&fileDate=07-20-2018&subNumber=10&version=1)
07-20-2018	0000	DILIGENCE DATE (ViewActivityCodeDetail.jsp? caseNumber=2018SC004328&activityTypeCode=112&countNumber=0000&fileDate=07-20-2018&subNumber=11&version=1)
07-20-2018	0000	SUMMONS ISSUED (ViewActivityCodeDetail.jsp? caseNumber=2018SC004328&activityTypeCode=5385&countNumber=0000&fileDate=07-20-2018&subNumber=13&version=1)
07-20-2018	0000	AFFIDAVIT (ViewActivityCodeDetail.jsp? caseNumber=2018SC004328&activityTypeCode=7660&countNumber=0000&fileDate=07-20-2018&subNumber=14&version=1) - AS TO MILITARY SERVICE

If you have questions, or you are experiencing technical difficulties,  
please **CLICK HERE** ([./CONTACTUS.DO](#)) to contact us.

## **APPENDIX H**





18TH JUDICIAL CIRCUIT COURT CLERK  
DUPAGE COUNTY ILLINOIS

## Case Summary Details

### Case Details

<b>Case Number</b>	2019SC004307	<b>Next Court Date</b>									
<b>File Date</b>	08-01-2019	<b>Next Court Location</b>									
<b>Case Title</b>	CAVALRY SPV I LLC -VS- ANGELA L JORDAN	<b>Next Court Time</b>									
<b>Agency</b>	Clerks Office	<b>Assigned Location</b>	COURTROOM 2006								
<b>Legal Status</b>	CLOSED	<b>Address Change</b>	<a href="#">Change Address Only (addressChange.do)</a>								
<b>Balance Due Amount</b>	\$0.00										
<b>Counts</b>	<table><tr><th>Count Number</th><th>Count Description</th><th>Count Status</th><th>Complaint Number</th></tr><tr><td>0001</td><td>CONTRACT \$2,500.01 - \$10,000</td><td>CLOSED</td><td></td></tr></table>			Count Number	Count Description	Count Status	Complaint Number	0001	CONTRACT \$2,500.01 - \$10,000	CLOSED	
Count Number	Count Description	Count Status	Complaint Number								
0001	CONTRACT \$2,500.01 - \$10,000	CLOSED									

## List of Case Events

File Date	Count Number	Description
02-26-2020	0001	DWP (ViewActivityCodeDetail.jsp? caseNumber=2019SC004307&activityTypeCode=1790&countNumber=0001&fileDate=02-26-2020&subNumber=36&version=1)
08-30-2019	0000	AFFIDAVIT (ViewActivityCodeDetail.jsp? caseNumber=2019SC004307&activityTypeCode=7660&countNumber=0000&fileDate=08-30-2019&subNumber=28&version=1) - OF NON-SERVICE
08-14-2019	0000	PLACEMENT ON CALL - EFILEIL (ViewActivityCodeDetail.jsp? caseNumber=2019SC004307&activityTypeCode=8251&countNumber=0000&fileDate=08-14-2019&subNumber=23&version=1)
08-13-2019	0000	SUMMONS ISSUED (ViewActivityCodeDetail.jsp? caseNumber=2019SC004307&activityTypeCode=5385&countNumber=0000&fileDate=08-13-2019&subNumber=25&version=1)
08-01-2019	0000	APPEARANCE (ViewActivityCodeDetail.jsp? caseNumber=2019SC004307&activityTypeCode=5195&countNumber=0000&fileDate=08-01-2019&subNumber=8&version=1)
08-01-2019	0000	NEW CASE COMPLAINT PETITION (ViewActivityCodeDetail.jsp? caseNumber=2019SC004307&activityTypeCode=5350&countNumber=0000&fileDate=08-01-2019&subNumber=10&version=1)
08-01-2019	0000	DILIGENCE DATE (ViewActivityCodeDetail.jsp? caseNumber=2019SC004307&activityTypeCode=112&countNumber=0000&fileDate=08-01-2019&subNumber=11&version=1)

If you have questions, or you are experiencing technical difficulties,  
please **CLICK HERE** ([./CONTACTUS.DO](#)) to contact us.